

EXHIBIT D

Ronald M Adams
CLERK SUPERIOR COURT

IN THE SUPERIOR COURT OF GLYNN COUNTY
STATE OF GEORGIA

THE CITY OF BRUNSWICK, GEORGIA,

Plaintiff,

v.

**SOUTHEASTERN EDUCATIONAL
SERVICES, INC.,**

Defendant.

CE23-00918

Case No. _____

MOTION FOR EMERGENCY TEMPORARY RESTRAINING ORDER

COMES NOW, the City of Brunswick (the “City” or “Plaintiff”) and files this its Motion for an Emergency Temporary Restraining Order, pursuant to O.C.G.A. § 9-11-65(b), and requests a temporary restraining order, preliminary and permanent injunction against Defendant’s continued operation of a nuisance facility on the Subject Property that has continuously shown a dangerous threat to the safety of the public and is a detriment to the health and welfare of the community. Said Property having been specifically identified in Plaintiff’s Verified Complaint and Brief in Support of Motion for an Emergency Temporary Restraining Order being filed concurrently herewith.

Pursuant to O.C.G.A. § 9-11-65(b)(2), Plaintiff’s counsel hereby certifies that concurrent notice of this Motion has not been given to Defendant due to the imminent and real threat Defendant will continue or reopen its operation of a dangerous nuisance on the Subject Property that is set forth more fully in Plaintiff’s Complaint and Brief in Support of Motion for an Emergency Temporary Restraining Order being filed concurrently herewith.

WHEREFORE, for the reasons set forth above and in Plaintiff’s Brief in Support of Motion for an Emergency Temporary Restraining Order, Plaintiff requests that the Court grant its request

and issue an Emergency Restraining Order and for any such other relief as this Court deems just and proper.

This 21st day of July 2023.

MCQUIGG, SMITH & CORRY, LLC

/s/ Brian D. Corry

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